IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

THE STATE OF ILLINOIS, ex rel., KWAME RAOUL, ATTORNEY GENERAL.,

Plaintiff,

Civil Action No. 1:23cv170

v.

ELI LILLY AND COMPANY, et al.

Defendants.

ORAL ARGUMENT REQUESTED

UNITEDHEALTH GROUP INCORPORATED AND OPTUMINSIGHT, INC.'S RULE 12(b)(2) MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Defendants UnitedHealth Group Incorporated and OptumInsight, Inc. respectfully move the Court under Federal Rule of Civil Procedure 12(b)(2) for an order dismissing the Complaint with prejudice for lack of personal jurisdiction. In support of this motion, Defendants state as follows:

- 1. The State's Complaint should be dismissed pursuant to Fed. R. Civ. P. 12(b)(2) because this Court lacks personal jurisdiction over UHG and OptumInsight.
- 2. There is no general jurisdiction over UHG or OptumInsight because neither company is at home in Illinois (and there is otherwise no basis for general jurisdiction).
- 3. There is no specific jurisdiction over either UHG or OptumInsight because there are no factual allegations establishing that either company has suit-related contacts with Illinois creating a substantial connection with the State such that exercising jurisdiction over them would comport with the Due Process Clause of the Fourteenth Amendment.

4. Because this suit does not arise out of or relate to either UHG or OptumInsight's contacts with the forum, the exercise of personal jurisdiction would offend traditional notions of

fair play and substantial justice.

WHEREFORE, for the reasons provided in the accompanying brief, Defendants

UnitedHealth Group Incorporated and OptumInsight, Inc. respectfully request that this Court

dismiss Plaintiff's Complaint with prejudice.

Dated: March 6, 2023.

Respectfully submitted,

UNITEDHEALTH GROUP INCORPORATED AND OPTUMINSIGHT, INC.

/s/ Patricia Brown Holmes

Patricia Brown Holmes

Lucas Thor Rael

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023, I electronically filed the foregoing with the Clerk

of Court using the CM/ECF system, which will send notification of such filing to all counsel of

record.

/s/ Patricia Brown Holmes
Patricia Brown Holmes

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